

IN THE UNITED STATES COURT OF FEDERAL CLAIMS

Electronically filed November 4, 2022

| | | |
|-------------------------------|---|--------------------------|
| TODD HENNIS, |) | |
| |) | |
| Plaintiff, |) | |
| |) | 21-1654L |
| v. |) | |
| |) | Judge Armando O. Bonilla |
| THE UNITED STATES OF AMERICA, |) | |
| |) | |
| Defendant. |) | |
| _____ |) | |

**JOINT MOTION TO DEFER JOINT PRELIMINARY STATUS REPORT
PENDING SETTLEMENT DISCUSSIONS**

Plaintiff Todd Hennis and Defendant United States jointly move to defer the filing of their Joint Preliminary Status Report under RCFC Appendix A, Section III to allow the parties time to explore settlement. Under Appendix A, the parties' Joint Preliminary Status Report is currently due November 17, 2022.

In support of this motion, the parties state that counsel for both parties met on November 3, 2022, for their early meeting of counsel under RCFC Appendix A, Section II. As part of that early meeting, the parties agreed it would be appropriate to explore settlement in advance of commencing any discovery and setting a schedule for further proceedings. The parties therefore propose that the deadline for filing their Joint Preliminary Status Report be deferred pending these discussions.

The parties also jointly propose that the Court allow ninety (90) days for such discussions, to and including February 2, 2023. The parties propose to file a joint status report on or before that date regarding those efforts and proposing a schedule for further proceedings.

November 4, 2022

Respectfully submitted,

s/ Kara Rollins

Kara Rollins
New Civil Liberties Alliance
1225 19th Street, NW, Suite 450
Washington, DC 20036
Telephone: 202-967-2502

Gregory Dolin
New Civil Liberties Alliance
1225 19th Street, NW, Suite 450
Washington, DC 20036
Telephone: 202-908-6203

ATTORNEYS FOR PLAINTIFFS

TODD KIM
Assistant Attorney General
Environment & Natural Resources Division

s/ Kristine S. Tardiff

KRISTINE S. TARDIFF
United States Department of Justice
Environment & Natural Resources Division
Natural Resources Section
53 Pleasant Street, 4th Floor
Concord, NH 03301
Telephone: 603-230-2583
Facsimile: 202-305-0506
E-Mail: kristine.tardiff@usdoj.gov

CHRISTOPHER CHELLIS
United States Department of Justice
Environment & Natural Resources Div.
Natural Resources Section
P.O. Box 7611
Washington, D.C. 20044-7611
Telephone: (202) 353-5371
Facsimile: (202)-305-0506
Email: christopher.chellis@usdoj.gov

Counsel for Defendant United States